

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re: Chapter 11
CarePoint Health Systems Inc. d/b/a Just Health Case No. 24-12534 (JKS)
Foundation, et al.,¹ (Jointly Administered)
Debtors. ----- v

THIRD AMENDED² NOTICE OF AGENDA REGARDING MATTERS SCHEDULED
FOR HEARING ON
JANUARY 17, 2025 AT 1:30 P.M. (ET)³

The Hearing Has Been Moved to 1:30 P.M. (ET)

This proceeding will be conducted **in-person**.
All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom.
Please refer to Judge Stickles' Chambers Procedures
(<https://www.deb.uscourts.gov/content/judge-j-kate-stickles>) and the Court's website
(<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate
remotely, the method of allowed participation (video or audio), Judge Stickles' expectations of
remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Prevailing Eastern Time) the business day before the
hearing unless otherwise noticed using the [eCourtAppearances](http://www.deb.uscourts.gov/ecourt-appearances) tool available on the Court's
website.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: (i) Bayonne Intermediate Holdco, LLC (7716); (ii) Benego CarePoint, LLC (2199); (iii) Briar Hill CarePoint, LLC (iv) CarePoint Health Management Associates Intermediate Holdco, LLC (none); (v) CarePoint Health Management Associates, LLC d/b/a CarePoint Health (3478); (vi) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (6996); (vii) CH Hudson Holdco, LLC (3376); (viii) Christ Intermediate Holdco, LLC (3376); (ix) Evergreen Community Assets (1726); (x) Garden State Healthcare Associates, LLC (4414); (xi) Hoboken Intermediate Holdco, LLC (2105); (xii) Hudson Hospital Holdco, LLC (3869); (xiii) Hudson Hospital Opco, LLC d/b/a CarePoint Health-Christ Hospital (0608); (xiv) HUMC Holdco, LLC (3488); (xv) HUMCO Opco, LLC d/b/a CarePoint Health-Hoboken University Medical Center (7328); (xvi) IJKG, LLC (7430); (xvii) Just Health MSO, LLC (1593); (xviii) New Jersey Medical and Health Associates d/b/a CarePoint Health Medical Group (0232); (xix) Quality Care Associates, LLC (4710); (xx) Sequoia BMC Holdco, LLC (9812); (xxi) IJKG Opco LLC d/b/a CarePoint Health-Bayonne Medical Center (2063). The address for CarePoint Health Systems Inc. is 308 Willow Avenue, Hoboken, NJ 07030.

² All Amendments are highlighted in **Bold**.

³ All motions and other pleadings referenced herein are available online at the following web address:
<https://dm.epiq11.com/CarePoint>

I. MATTERS GOING FORWARD

1. Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of an Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/08/2025; D.I. [417](#)].

Related Documents:

- A. Notice of Filing of Plan Term Sheet [Filed: 12/30/2024; D.I. [378](#)].
- B. Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 01/08/2025; D.I. [412](#)].
- C. Order Granting Motion to Shorten Notice and Schedule Expedited Hearing with Respect to Motion of the Debtors and The Official Committee of Unsecured Creditors Seeking Authority to File Combined Disclosure Statement and Plan [Filed: 01/08/2025; D.I. [419](#)].

Objection Deadline: January 15, 2025 at 10:00 a.m.

Responses:

- D. Objection of Senior Secured Agents to Interim Approval of Plan Proponents' Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 01/15/2025; D.I. [458](#)].
- E. Objection of Senior Secured Agents to Plan Proponents' Proposed Confirmation Schedule [Filed: 01/15/2025; D.I. [459](#)].
- F. Insight Management and Consulting Services, Inc.'s Objection to the Debtors' Motion (I) Approving the Combined Disclosure Statement and Plan on an Interim Basis for Solicitation Purposes Only; (II) Establishing Solicitation and Tabulation Procedures; (III) Approving the Form of Ballot and Solicitation Materials; (IV) Establishing the Voting Record Date; (V) Fixing the Date, Time, and Place for the Combined Hearing and the Deadline for Filing Objections Related Thereto; and (VI) Granting Related Relief [Filed: 01/15/2025; D.I. [460](#)].
- G. Objection and Reservation of Rights with Respect to motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of an Order (I) Approving the Disclosure Statement on an Interim Basis; (II)

Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [462](#)].

- H. Objection and Reservation of Rights of Creditor, Resolute Perioperative Services, LLC to the Debtors and the Official Committee of Unsecured Creditors' Joint Motion for the Entry of an Order Approving the Combined Disclosure Statement and Chapter 11 Plan of Reorganization [Filed: 01/15/2025; D.I. [463](#)].
- I. Reservation of Rights of J2 Funding, LLC, Signature RX Investments, LLC, and Bills Right LLC to Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [464](#)].
- J. Objection of CarePoint Health Captive Assurance Company, LLC to Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of an Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [466](#)].
- K. BMC Hospital, LLC's Objection to Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [467](#)].
- L. Objection and Reservation of Rights to Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [468](#)].
- M. Objection of the U.S. Trustee to Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of Order (I) Approving the

Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [469](#)].

- N. Objection and Reservation of Rights with Respect to Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [470](#)].
- O. Response of the New Jersey Department of Health to the Plan Proponents' Motion for Entry of an Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [471](#)].
- P. Declaration of James P. Flynn In Support of BMC Hospital, LLC's Objection to Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [472](#)].
- Q. The County of Hudson's Limited Objection and Reservation of Rights to Debtors and Official Committee of Unsecured Creditors for Entry of Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [474](#)].
- R. Preliminary Objection, Joinder, and Reservation of Rights of Dr. Vijayant Singh, in His Capacity as Relator, to Motion of the Debtors and Official Committee of Unsecured Creditors for Entry of Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and

Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [475](#)].

- S. **Strategic Ventures LLC's (I) Objection to (A) Interim Approval of Plan Proponents' Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization and (B) Proposed Confirmation Schedule, and (II) Reservation of Rights** [Filed: 01/16/2025; D.I. [496](#)].
- T. **Pennsylvania Manufacturers' Association has informally objected and reserved rights.**

Additional Related Documents:

- U. **First Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization** [Filed: 01/16/2025; D.I. [497](#)].
- V. **CarePoint Liquidation Analysis** [Filed: 01/16/2025; D.I. [498](#)].
- W. **Redline of First Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization** [Filed: 01/16/2025; D.I. [499](#)].

Status: This matter is going forward.

- 2. Motion of the Debtors for Entry of an Order (I) Approving Stipulation Between Debtors, Bayonne Medical Center OPCO, LLC, Hudson Regional Hospital, LLC and the Official Committee of Unsecured Creditors Regarding Interim Management of Debtors' Hospitals and (II) Granting Related Relief [Filed: 12/30/2024; D.I. [377](#)].

Related Documents: None

Objection Deadline: January 6, 2025 at 4:00 p.m. (ET).

Objections Received:

- A. Limited Objection of BMC Hospital, LLC to Motion of the Debtors for Order (I) Approving Stipulation Between Debtors, Bayonne Medical Center OPCO, LLC, Hudson Regional Hospital, LLC and the Official Committee of Unsecured Creditors Regarding Interim Management of Debtors' Hospitals and (II) Granting Related Relief [Filed: 01/06/2025; D.I. [398](#)].
- B. Limited Objection and Reservation of Rights of J2 Funding, LLC, Signature RX Investments, LLC, and Bills Right LLC to Debtors' Motion for Entry of Order (I) Approving Stipulation Between Debtors, Bayonne Medical Center OPCO, LLC, Hudson Regional Hospital, LLC and the Official Committee of Unsecured Creditors Regarding Interim Management of Debtors' Hospitals and (II) Granting Related Relief [Filed: 01/06/2025; D.I. [404](#)].

- C. Limited Objection and Reservation of Rights to Motion of the Debtors for Order (I) Approving Stipulation Between Debtors, Bayonne Medical Center OPCO, LLC, Hudson Regional Hospital, LLC and the Official Committee of Unsecured Creditors Regarding Interim Management of Debtors' Hospitals and (II) Granting Related Relief [Filed: 01/06/2025; D.I. [406](#)].

Additional Related Documents:

- D. **Reply of the Debtors to the Limited Objection of BMC Hospital, LLC to the Motion of the Debtors Regarding the Stipulation for Interim Management of Debtors' Hospitals** [Filed: 01/16/2025; D.I. [494](#)].
- E. **Proposed Order Approving Stipulation Regarding Collateral Surrender Motion, Joint Venture MSA Motion and Facilities MSA Motion** [Filed: 01/16/2025; D.I. [495](#)].

Status: The parties to the Stipulation have agreed that this matter will go forward with respect to the limited issue of authority of HRH to operate and provide services to the Debtors on an interim basis, but not with respect to the issue of the terms of compensation to HRH for interim services.

3. Official Committee of Unsecured Creditors' Motion to Shorten Notice of Motion Regarding the Challenge Deadline [Filed: 01/14/2025; D.I. [435](#)].

Related Documents:

- A. Motion of the Official Committee of Unsecured Creditors for Entry of an Order Regarding the Challenge Deadline [Filed: 01/14/2025; D.I. [434](#)].

Status: This matter is being heard as a status conference.

II. MATTERS NOT GOING FORWARD

4. Motion of Debtors IJKG Opco, LLC and IKJG, LLC for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow *Inter Alia*, Interim Hospital Operations, (B) A Final Order Approving A Private Sale of All Or Substantially All Assets of IJKG Opco, LLC and IJKG, LLC and (C) Granting Related Relief [Filed: 11/04/2024, D.I. [18](#)].

Related Documents:

- A. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)].

- B. Certification of Counsel Regarding Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/09/2024; D.I. [266](#)]
- C. Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/10/2024; D.I. [272](#)]

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The supplemental objection deadline is December 11, 2024 at 4:00 p.m. (ET). The Objection Deadline was further extended to December 20, 2024 at 4:00 p.m. (ET)[D.I. [272](#)].

Responses:

- D. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024, D.I. [71](#)].
- E. BMC Hospital, LLC's Objection to (I) Bayonne Debtors' DIP Financing Motion (II) Collateral Surrender Motion, and (III) Management Services Motion [Filed: 11/06/2024; D.I. [76](#)].
- F. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)].
- G. Limited Objection of Sodexo Operations, LLC to: (1) Motion of Debtors IJKG Opco, LLC and IKJG, LLC for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow Inter Alia, Interim Hospital Operations, (B) A final Order Approving a Private Sale of All or Substantially All Assets of IJKG opco, LLC and IJKG, LLC and (C) Granting Related Relief; (2) Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Assumption of Management Services Agreement, (II) Scheduling a Final Hearing, and (III) Granting Related Relief; and (3) Motion of the Debtors for an Order (I) Authorizing the Entry Into the Hospital Facilities Management Services Agreement, and (II) Granting Related Relief [Filed: 12/19/2024; D.I. [331](#)].
- H. Reservation of Rights and, to the Extent Necessary, Limited Objection to Debtor's Motion for Entry of Orders (A) Approving Collateral Surrender Agreement and (B) Authorizing the Assumption of the Management Services Agreement and the Form and Manner of Notice Thereof [Filed: 12/20/2024; D.I. [332](#)].
- I. Reservation of Committee of Interns and Residents to Debtors' Motion for a Private Sale of Bayonne Medical Center [Filed: 12/20/2024; D.I. [333](#)].
- J. First Financial Holdings, LLC dba First Financial Equipment Leasing's Opposition to Debtors IJKG Opco, LLC and IKJG, LLC's Motion for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow Inter Alia, Interim Hospital Operations, (B)

A final Order Approving a Private Sale of All or Substantially All Assets of IJKG opco, LLC and IJKG, LLC and (C) Granting Related Relief [Filed: 12/20/2024; D.I. [334](#)].

- K. Affidavit in Support of Opposition of First Financial Holdings, LLC dba First Financial Equipment Leasing re D.I. 334 [Filed: 12/20/2024; D.I. [335](#)].
- L. Joinder of SCG Capital Corporation to First Financial Holdings, LLC dba First Financial Equipment Leasing's Opposition to Debtors IJKG Opco, LLC and IKJG, LLC's Motion for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow Inter Alia, Interim Hospital Operations, (B) A final Order Approving a Private Sale of All or Substantially All Assets of IJKG opco, LLC and IJKG, LLC and (C) Granting Related Relief [Filed: 12/20/2024; D.I. [337](#)].
- M. Limited Objection and Reservation of Rights of Cerecore [Filed: 12/20/2024; D.I. [338](#)].

Status: The Debtors are not seeking approval of the Motion at this time. The Debtors will seek limited relief related to the Motion pursuant to D.I. 377 at a hearing scheduled for February 12, 2025 at 10:00 a.m.

- 5. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Assumption of Management Services Agreement, (II) Scheduling a Final Hearing, and (III) Granting Related Relief [Filed: 11/04/2024, D.I. [19](#)].

Related Documents:

- A. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)]. (See 4A)
- B. Certification of Counsel Regarding Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/09/2024; D.I. [266](#)]. (See 4B)
- C. Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/10/2024; D.I. [272](#)]. (See 4C)

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The supplemental objection deadline is December 11, 2024 at 4:00 p.m. (ET). The Objection Deadline was further extended to December 20, 2024 at 4:00 p.m. (ET)[D.I. [272](#)].

Responses:

- D. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024, D.I. [71](#)]. (See 4D)
- E. BMC Hospital, LLC's Objection to (I) Bayonne Debtors' DIP Financing Motion (II) Collateral Surrender Motion, and (III) Management Services Motion [Filed: 11/06/2024; D.I. [76](#)]. (See 4E)
- F. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)]. (See 4F)
- G. Limited Objection of Sodexo Operations, LLC to: (1) Motion of Debtors IJKG Opco, LLC and IKJG, LLC for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow Inter Alia, Interim Hospital Operations, (B) A final Order Approving a Private Sale of All or Substantially All Assets of IJKG opco, LLC and IJKG, LLC and (C) Granting Related Relief; (2) Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Assumption of Management Services Agreement, (II) Scheduling a Final Hearing, and (III) Granting Related Relief; and (3) Motion of the Debtors for an Order (I) Authorizing the Entry Into the Hospital Facilities Management Services Agreement, and (II) Granting Related Relief [Filed: 12/19/2024; D.I. [331](#)]. (See 4G)
- H. Limited Objection and Reservation of Rights of Cerecore [Filed: 12/20/2024; D.I. [338](#)]. (See 4M)

Status: The Debtors are not seeking approval of the Motion at this time. The Debtors will seek limited relief related to the Motion pursuant to D.I. 377 at a hearing scheduled for February 12, 2025 at 10:00 a.m.

- 6. Motion of the Debtors for an Order (I) Authorizing the Entry Into the Hospital Facilities Management Services Agreement, and (II) Granting Related Relief [Filed: 12/01/2024; D.I. [212](#)].

Related Documents:

- A. Certification of Counsel Regarding Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/09/2024; D.I. [266](#)] (See 4B)
- B. Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/10/2024; D.I. [272](#)] (See 4C)

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The Objection Deadline was extended to December 20, 2024 at 4:00 p.m. (ET).

Objections Received:

- C. Limited Objection of Sodexo Operations, LLC to: (1) Motion of Debtors IJKG Opco, LLC and IKJG, LLC for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow Inter Alia, Interim Hospital Operations, (B) A final Order Approving a Private Sale of All or Substantially All Assets of IJKG opco, LLC and IJKG, LLC and (C) Granting Related Relief; (2) Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Assumption of Management Services Agreement, (II) Scheduling a Final Hearing, and (III) Granting Related Relief; and (3) Motion of the Debtors for an Order (I) Authorizing the Entry Into the Hospital Facilities Management Services Agreement, and (II) Granting Related Relief [Filed: 12/19/2024; D.I. [331](#)]. (See 4G)
- D. Limited Objection and Reservation of Rights of Cerecore [Filed: 12/20/2024; D.I. [338](#)]. (See 4M)

Status: The Debtors are not seeking approval of the Motion at this time. The Debtors will seek limited relief related to the Motion pursuant to D.I. 377 at a hearing scheduled for February 12, 2025 at 10:00 a.m.

Dated: January 15, 2025

DILWORTH PAXSON LLP

/s/ Peter C. Hughes

Peter C. Hughes (DE 4180)
800 N. King Street, Suite 202
Wilmington, DE 19801
Telephone: 302-571-9800
Facsimile: 302-571-8875
Email: phughes@dilworthlaw.com

and

Lawrence G. McMichael (admitted *pro hac vice*)
Peter C. Hughes (DE 4180)
Anne M. Aaronson (admitted *pro hac vice*)
Jack Small (admitted *pro hac vice*)
1650 Market St., Suite 1200
Philadelphia, PA 19103
Telephone: (215) 575-7000
Facsimile: (215) 754-4603
Email: lmcmichael@dilworthlaw.com
Email: phughes@dilworthlaw.com
Email: aaaronson@dilworthlaw.com

Email: jsmall@dilworthlaw.com

Counsel for the Debtors